UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CONSORZIO DEL PROSCIUTTO DI	)	
SAN DANIELE,	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 07-039 ML
	)	
DANIELE, INC.,	)	
Defendant.	)	

MOTION FOR EXTENSION OF TIME TO DISCLOSE EXPERT WITNESSES

Plaintiff hereby moves for an extension of time to file its expert witness disclosures. Its reasons are as follows.

In its Pretrial Scheduling Order of December 13, 2007, the Court set March 3, 2008 as the date for disclosure of Plaintiff's expert witnesses.

Plaintiff and Defendant have been engaged in extensive discussions concerning Defendant's objections to many of Plaintiff's interrogatories and requests for document production. In addition, Defendant has filed a motion to stay discovery on Counts II and III of Plaintiff's Complaint. Defendant has refused to answer certain interrogatories and document requests until the Court rules on its motion. Discovery has therefore been significantly delayed. Plaintiff needs to have further responses to its discovery requests before it is required to disclose its expert witnesses and their testimony.

Finally, we have just been notified that new lead counsel for Defendant has entered his appearance in this action. He has requested a Rule 16 pre-trial conference, saying that he might "have a different take on the issues in this case." Plaintiff should have the opportunity to hear from counsel before proceeding with disclosure of expert witnesses.

Plaintiff therefore respectfully requests that the Court suspend the date for Plaintiff to file its expert witness disclosures until such time as it has held the conference requested by Defendant. Plaintiff also requests that the other dates set in the Pretrial Scheduling Order be re-set as appropriate, following the requested Rule 16 conference.

Plaintiff expects presently to file a motion to compel discovery by Defendant. Plaintiff respectfully requests that the hearing on its motion to compel discovery be held jointly with the hearing on Defendant's motion to stay discovery. Plaintiff agrees with Defendant's suggestion that the requested Rule 16 conference be held at the same time.

Defendant's counsel has consented to this motion.

/s/ Matthew F. Medeiros
Matthew F. Medeiros (#1856)
LITTLE MEDEIROS KINDER BULMAN
& WHITNEY, P.C.
72 Pine Street
Providence, RI 02903
Tel: (401) 272-8080
Fax: (401) 272-8195
mfm@lmkbw.com

/s/ Michael H. Selter
Michael H. Selter (pro hac vice)
Stuart E. Benson (pro hac vice)
Manelli Denison & Selter PLLC
Suite 2000 M Street, N.W., Suite 700
Washington, D.C. 20036
Tel: (202) 261-1000
Fax: (202) 887-0336

Counsel for Plaintiff

CERTIFICATION

I hereby certify that on March 3, 2008 a copy of the foregoing Plaintiff's Motion for Extension of Time to Disclose Expert Witnesses was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system, or by e-mail or to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Girard R. Visconti, Esquire	Grv@viscontilaw.com
Jessica L. Papazian-Ross, Esquire	Jlpr@viscontilaw.com
Steven E. Snow, Esquire	ses@psh.com

/s/ Matthew F. Medeiros_______________

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